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August 23, 2023

**VIA ECF FILING**

Honorable Charles Eskridge  
United States District Judge  
515 Rusk Street  
Houston, Texas 77002

Re: Jarmain Hinton v. Nuksy's Fine Catering, LLC, et al.  
U.S.D.C. (S.D. Tex.) Case No. 4:22-cv-2576

Your Honor,

Plaintiff requests permission to file a Motion to Compel. Plaintiff filed his Complaint against Defendants on August 3, 2022. Defendants filed their Answer on November 2, through their counsel Phillip J. Yates. On May 22, 2023, Plaintiff propounded his First Set of Interrogatories and Requests for Production of Documents to Defendants. Responses to the discovery were due on or about June 21.

By email dated July 7, Plaintiff's counsel requested Defendants' counsel to provide responses and included a Good Faith Letter regarding discovery. Defendants' counsel did not respond to the email, including the Good Faith Letter. Plaintiff's counsel subsequently attempted to contact Defendants' counsel via telephone call in an attempt to resolve the discovery issues. Defendants' counsel did not respond to said telephone call. Defendants have failed to respond to Plaintiff's request for responses.

Plaintiff respectfully submits that this Court allow Plaintiff file a Motion to Compel Discovery Responses, and subsequently should enter an order compelling Defendants to respond to the Plaintiff's First Set of Interrogatories and Requests for Production of Documents. Plaintiff further requests that this Court order Defendants to pay the reasonable costs and attorney's fees associated with the Motion Plaintiff plans to file. Plaintiff's counsel certifies that he has in good faith attempted to confer with counsel for Defendants in an effort to obtain responses without Court action.

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practice in courts in:

- 1 - Colorado
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- 3 - Indiana
- 4 - Michigan
- 5 - Missouri
- 6 - Nebraska
- 7 - New Mexico
- 8 - North Dakota
- 9 - Ohio
- 10 - Oklahoma
- 11 - Tennessee
- 12 - Texas
- 13 - Washington
- 14 - Wisconsin

\* Not licensed in  
Arkansas state court

Thank you for your time and attention to this matter.

Sincerely,  
SANFORD LAW FIRM, PLLC

*/s/ Josh Sanford*

Josh Sanford  
Attorney at Law